IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

JENNIFER L. RYAN,

Plaintiff,

v.

Civil Action No. 3:25-cv-00325-X-BT

UNITED STATES DEPARTMENT OF JUSTICE, et al.,

Defendants.

DEFENDANTS' UNOPPOSED MOTION TO SET RESPONSE DEADLINE

Defendants move unopposed under Federal Rule of Civil Procedure 6(b)(1)(A) to set June 30, 2025, as the consolidated response deadline for both defendants (the U.S. Department of Justice and Karen E. Rochlin, sued in her official and individual capacities).

Good cause exists to set June 30, 2025 as Defendants' consolidated deadline to file a responsive pleading or pleadings. The Department of Justice's Civil Division recently approved individual-capacity representation for Rochlin, and the U.S. Attorney's Office accepted service on Rochlin's behalf and on behalf of the U.S. Attorney that same day, April 30, 2025. *See* Fed. R. Civ. P. 4(i)(1)(A), (2), (3). Under Federal Rules of Civil Procedure 12(a)(2) and (3), the deadlines for Defendants to respond to the complaint would fall on various dates depending on service, with the earliest possible date being May 19, 2025. To streamline and progress the case efficiently, Defendants respectfully

request that the Court set June 30, 2025, as the consolidated deadline for Defendants to file a responsive pleading or pleadings. June 30, 2025 is 60 days from when the U.S. Attorney's Office accepted service on behalf of Rochlin and the U.S. Attorney. Plaintiff does not oppose this request.

Therefore, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court to set June 30, 2025, as the consolidated response deadline for both defendants.

Respectfully submitted,

CHAD E. MEACHAM Acting United States Attorney

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Attorneys for Defendants

Certificate of Conference

I certify that, on April 30, 2025, the U.S. Attorney's Office conferred with Plaintiff regarding this motion, and Plaintiff stated she does not oppose the motion.

/s/ Lisa R. Hasday Lisa R. Hasday Assistant United States Attorney

Certificate of Service

On May 2, 2025, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Lisa R. Hasday Lisa R. Hasday Assistant United States Attorney